

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**In Re: TERRY L. HADLEY and  
ARLISA S. HADLEY**

**CHAPTER 13  
NO. 14-13303 JDW**

**Citimortgage, Inc.  
P. O. Box 688971  
Des Moines, IA 50368**

**NOTICE**

YOU ARE HEREBY NOTIFIED that a written response to the Objection to Secured Claim of Citimortgage, Inc. must be filed via ECF if you are registered with the Electronic Case Filing system, or alternatively filed with:

David J. Puddister, Clerk  
U.S. Bankruptcy Court  
Thad Cochran, U.S. Courthouse  
703 Highway 145 North  
Aberdeen, MS 39730

with a copy served on Robert Gambrell, attorney for the debtor(s) and the Chapter 13 Trustee, on or before thirty (30) from the date of this notice, or the Court may enter a Confirmation Order, or in the alternative, may enter an order ex-parte, either of which shall sustain this Objection to Secured Claim of Citimortgage, Inc. and shall determine the amount of interest allowed to be charged, if any is allowed at all, shall set the value of the collateral, and the manner in which the claim shall be treated and paid by the trustee. The entry of the an ex-parte order or a confirmation order shall grant all relief requested therein. In the event a written response is filed, the Court will notify you of the date, time and place of the hearing thereon.

DATED: 10/10/14  
CHAPTER 13 TRUSTEE:  
Terre M. Vardaman  
P. O. Box 1326  
Brandon, MS 39043-1326  
(601)825-7663

/s/ Robert Gambrell  
Robert Gambrell, Atty for Debtors  
101 Ricky D. Britt Blvd., Ste. 3  
Oxford, MS 38655  
(662)281-8800 / Fax: 662-202-1004  
MS Bar # 4409

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**In Re: TERRY L. HADLEY and  
ARLISA S. HADLEY**

**CHAPTER 13  
NO. 14-13303 JDW**

**OBJECTION TO SECURED CLAIM OF CITIMORTGAGE, INC.**

COMES NOW, Debtors, by and through undersigned counsel, and files this Objection to Secured Claim of Citimortgage, Inc. to the following pre-petition claim and requests the Court to set the amount of the claim, or to set the value of the collateral for purpose of plan confirmation, or to determine the manner in which the arrears claim shall be treated and paid by the trustee:

DESCRIPTION OF COLLATERAL: 406 Exchange St., Tupelo, MS

Approximate amount of the claim: \$12,000.00

TREATMENT: Since the amount of the claim shown is an estimate, the full claim shall be paid as per the proof of claim unless counsel for the Debtor(s) objects to the proof of claim after it is filed. The allowed secured claim plus interest at the rate of 5.00% shall be paid through the plan pursuant to 11 U.S.C. §1322(c)(2). Upon payment of the claims in accordance with Section 1325(a)(5) of the Bankruptcy Code, unless otherwise ordered by the Court, the creditors shall release their liens and otherwise comply with applicable non-bankruptcy law.

DATED: 10/10/14

/s/ Robert Gambrell  
Robert Gambrell, Atty for Debtors

CERTIFICATE OF SERVICE

I, ROBERT GAMBRELL, Attorney for the above listed Debtors, do hereby certify that the following have been served electronically via ECF with a copy of the above Objection to Secured Claim of Citimortgage, Inc. and Notice of said Objection:

Henry G. Hobbs, Jr., Acting U. S. Trustee: USTPRegion05.JA.ECF@usdoj.gov  
Terre M. Vardaman VARDAMAN13ECF@gmail.com

I, further certify that I have this date mailed postage prepaid, a true and correct copy of said Objection and Notice to the following:

Citimortgage, Inc.  
P. O. Box 688971  
Des Moines, IA 50368

This the 10<sup>th</sup> day of October, 2014.

/s/ Robert Gambrell  
ROBERT GAMBRELL

